

FLORIDA THIRD DISTRICT COURT OF APPEAL

Antonio Michael Major v. Sheriff of Monroe County

No. 3D25-1883 · No. No. 3D25-1883 · Decided May 27, 2026

SUMMARY

The Florida Third District Court of Appeal affirmed a Public Employee Relations Commission decision involving an unfair labor practice charge filed by Antonio Michael Major against the Sheriff of Monroe County. The court cited statutory and administrative requirements governing the factual specificity, supporting evidence, and timeliness of such charges.

CASE DETAILS

COURT	Florida Third District Court of Appeal
WRITING FOR THE COURT	Per Curiam; Miller, J.; Gordo, J.; Gooden, J.
JURISDICTION	Florida Third District Court of Appeal
DECIDED	May 27, 2026
DOCKET	No. 3D25-1883
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Florida Public Employee Relations Commission concerning an unfair labor practice charge.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Antonio Michael Major v. Sheriff of Monroe County

TOPICS

- unfair labor practices
- labor law
- administrative law
- statutory interpretation
- appellate procedure

PRACTICE AREAS

- employment law
- labor law
- administrative law

QUESTIONS PRESENTED

- Whether the challenged unfair labor practice charge satisfied the statutory and administrative requirements for factual specificity, identification of involved individuals, identification of the allegedly violated statutory provisions, and supporting evidence.

2. Whether an unfair labor practice charge based on events occurring more than six months before filing was timely under section 447.503(6)(b), Florida Statutes.

HOLDINGS

1. The court affirmed the Public Employee Relations Commission's disposition while applying the requirements that an unfair labor practice charge contain a clear and concise factual statement, identify the individuals involved and the provisions allegedly violated, and be accompanied by sufficient sworn statements and documentary evidence to establish a prima facie violation.
2. The court affirmed while applying the rule that an unfair labor practice charge is untimely when based on events occurring more than six months before filing, absent the statutory exception for military service.

KEY QUOTATIONS

“A factually deficient charge cannot be cured by resorting to supporting documents.”

“The charge shall contain a clear and concise statement of the facts constituting the alleged unfair labor practice, including the name(s) of the individual(s) involved in the alleged unfair labor practice, the time and place of occurrence of the particular act(s) giving rise to the dispute . . . [and] [t]he specific provision(s) of Section 447.501, Florida Statutes, alleged to have been violated”

FACTUAL BACKGROUND

The opinion provides no detailed factual narrative. It indicates that Major pursued an unfair labor practice charge against the Sheriff of Monroe County and that the charge was challenged or rejected under requirements governing factual specificity, supporting evidence, and the six-month filing period.

PROCEDURAL HISTORY

Major appealed a decision of the Florida Public Employee Relations Commission to the Third District Court of Appeal. The appellate court affirmed without further explanation, citing statutory and administrative requirements governing the contents, supporting evidence, and timeliness of unfair labor practice charges.

DISPOSITION

affirmed

CASES CITED

- Titus v. Miami-Dade Water and Sewer Dep't Emp., 42 FPER 118 (2015)
- Sarasota CTA v. Sch. Bd. of Sarasota Cnty., 14 FPER ¶ 19010 (G.C. Summary Dismissal 1987)

OPINION

Antonio Michael Major v. Sheriff of Monroe County
PER CURIAM.

Third District Court of Appeal State of Florida Opinion filed May 27, 2026. Not final until disposition of timely filed motion for rehearing. _____ No. 3D25-1883 Lower Tribunal Nos. CA-2025-015 & 25U-0907 _____ Antonio Michael Major, Appellant, vs. Sheriff of Monroe County, Appellee. An Appeal from the State of Florida, Public Employee Relations Commission. Antonio Michael Major, in proper person. Allen, Norton & Blue, P.A., and Susan P. Norton, and Liana De La Noval, for appellee. Before MILLER, GORDO, and GOODEN, JJ. PER CURIAM. Affirmed. See § 447.503(1), Fla. Stat. (2025) (“[A] charge shall contain a clear and concise statement of facts constituting the alleged unfair labor practice, including the names of all individuals involved in the alleged unfair labor practice, specific reference to the provisions of s. 447.501 alleged to have been violated The charge must be accompanied by sworn statements and documentary evidence sufficient to establish a prima facie violation of the applicable unfair labor practice provision. Such supporting evidence is not to be attached to the charge and is to be furnished only to the commission.”); Fla. Admin. Code R. 60CC-5.001(3)(c), (d) (“The charge shall contain . . . [a] clear and concise statement of the facts constituting the alleged unfair labor practice, including the name(s) of the individual(s) involved in the alleged unfair labor practice, the time and place of occurrence of the particular act(s) giving rise to the dispute . . . [and] [t]he specific provision(s) of Section 447.501, Florida Statutes, alleged to have been violated”); § 447.503(6)(b), Fla. Stat. (“[A]n unfair labor practice charge is untimely if it is based on events that occurred more than six months prior to the filing date unless the person filing the charge was prevented from doing so by reason of service in the Armed Forces”); see also *Titus v. Miami-Dade Water and Sewer Dep’t Emp.*, 42 FPER 118 (2015) (“A factually deficient charge cannot be cured by resorting to supporting documents.”) 2 (citing *Sarasota CTA v. Sch. Bd. of Sarasota Cnty.*, 14 FPER ¶ 19010 (G.C. Summary Dismissal 1987)). 3